

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

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IN RE:	:	Chapter 11
	:	
CIRCUIT CITY STORES, et al.	:	Case No. 08-35653 (KRH)
	:	
Debtors.	:	Jointly Administered
	:	
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**NOTICE OF MOTION OF PIONEER ELECTRONICS, INC.  
UNDER FED. R. BANKR. P. 3020(a)  
FOR ORDER REQUIRING CONFIRMATION DEPOSIT**

PLEASE TAKE NOTICE that Pioneer Electronics, Inc., by counsel, has filed the above-described motion, a copy of which is available by accessing the court's website at [www.vaeb.uscourts.gov](http://www.vaeb.uscourts.gov) or by contacting the undersigned counsel.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not wish the Court to grant the motion, or if you want the Court to consider your views on the motion, you or your attorney **must**:

- **ON OR BEFORE FIVE (5) BUSINESS DAYS BEFORE THE SCHEDULED HEARING DATE STATED BELOW**, i.e. at or before 4:00 p.m. on Monday, November 16, 2009, file with the Court a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). The address of the Court for filing is:

Clerk  
United States Bankruptcy Court for the Eastern District of Virginia  
701 East Broad Street, Suite 4000  
Richmond, VA 23219.

**Unless a written response and supporting memorandum are filed on or before Monday, November 16, 2009, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing. If**

you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above. You must also provide a copy to the persons listed below so that these persons receive your response on or before Monday, November 16, 2009.

- Attend the hearing scheduled to be held on **November 23, 2009, at 10:00 a.m.** in Courtroom 5100, 701 East Broad Street, Suite 4000, Richmond, VA 23219.
- Provide a copy of any written response to the following persons:

William Daniel Sullivan  
Butzel Long Tighe Patton, PLLC  
1747 Pennsylvania Ave., N.W. Suite 300  
Washington, D.C. 20007

Office of the United States Trustee  
600 East Main Street, Suite 301  
Richmond, VA 23219

McGuireWoods, LLP  
One James Center  
901 East Carey Street  
Richmond, VA 23219  
ATTN: Dion W. Hayes  
ATTN: Douglas M. Foley

If you or your attorney do not take these steps, the Court may decide that you do not oppose the motion and may enter an order granting the motion.

Respectfully submitted,

/s/ William Daniel Sullivan  
William Daniel Sullivan (VSB #17493)  
Butzel Long Tighe Patton, PLLC  
1747 Pennsylvania Ave., N.W. Suite 300  
Washington, D.C. 20007  
Tel: 202-454-2850  
Fax: 202-454-2805  
[dsullivan@butzeltp.com](mailto:dsullivan@butzeltp.com)  
Counsel for Pioneer Electronics, Inc.

**Certificate of Service**

I hereby certify that true copies of the foregoing motion and the accompanying memorandum of point and authorities and proposed order were mailed, first-class postage prepaid, this 4th day of November 2009 to the Office of the United States Trustee, 600 East Main Street, Suite 301, Richmond, VA 23219, and served on all other parties entitled to notice hereof by electronic copies hereof delivered through the Court's ECF system.

/s/ William Daniel Sullivan